

February 1, 2005



Country of Origin Labeling program
Agricultural Marketing Service
USDA Stop 0249
Room 2092--S
1400 Independence Avenue, SW
Washington, D.C. 20250-0249

RE: Docket No. LS-03-04 "Mandatory Country of Origin Labeling of
Fish and Shellfish -- Interim Final Rule."

Dear Sir or Madam:

The Southern Shrimp Alliance (SSA) is pleased to report that the U.S. Department of Agriculture's (USDA) Agricultural Marketing Service (AMS), Mandatory Country of Origin Labeling of Fish and Shellfish; Interim Final Rule adequately addresses our concerns as outlined in SSA letter, dated April 9, 2003.

SSA is an alliance of the U.S. warm water wild shrimp fishery from eight states bordering the South Atlantic and Gulf of Mexico: North Carolina, South Carolina, Georgia, Florida, Alabama, Mississippi, Louisiana, and Texas. SSA represents thousands of vessel owners and operators, employees, seafood processors, as well as individuals, and businesses in communities whose economies are dependent on the continued viability of the domestic warm water shrimp fisheries.

SSA members provide a quality seafood product to the American consumer. Many customers prefer to purchase wild shrimp harvested in the United States because of the distinct taste, quality, and texture, among other benefits, of a fresh, wild caught product. This preference and sentiment is also shared by the U.S. Congress, who despite fiscal constraints has recognized the merits of promoting domestic wild shrimp by appropriating funds for the Wild American Shrimp Initiative (WASI).

Furthermore, Strategy First research findings for Wild American Shrimp Inc. revealed the following important facts:

1. Given a choice, 95 % of heavy shrimp consumers (eat shrimp more than two times per month) would choose or recommend wild-caught American shrimp over pond raised, imported shrimp in a restaurant or grocery store.

2. 92% of Americans that live on the Atlantic or Gulf Coasts, or those that visit coastal regions, expect shrimp they order in a restaurant to be caught in the open ocean.

It was clear from the study that most Americans don't know that 85% of the shrimp they eat is grown in ponds and imported to this country. Without clear labeling, Americans are misguided on where the majority of the shrimp they eat comes from. Since 95% of heavy shrimp consumers in America specify a preference for wild-caught, American shrimp, clearly labeling would provide a great benefit and service to American consumers.

Accordingly, SSA maintains that a comprehensive country of origin labeling requirement, as outlined in the Interim Final Rule will provide consumers with the information necessary to discern between U.S. and imported shrimp products and make a knowing and intelligent purchase.

Once again, SSA thanks AMS for addressing our concerns regarding country of origin labeling guidelines. We strongly feel that these guidelines are good for U.S. consumers and the U.S. seafood industry.

Sincerely,

Eddie Gordon
President
Southern Shrimp Alliance